

Hearing Date: March 20, 2008 at 10:00 a.m.  
Objection Date: March 17, 2008 at 5:00 p.m.

Robert J. Feinstein (RF 2836)  
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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

MICHAEL G. TYSON, et al.,

Debtors.

R. TODD NEILSON, Plan Administrator of the  
MGT Chapter 11 Liquidating Trust, on behalf of the  
MGT Chapter 11 Liquidating Trust and on behalf of  
Michael G. Tyson, an individual,

Plaintiff,

vs.

STRAIGHT-OUT PROMOTIONS, LLC, a  
Kentucky Limited Liability Company; CHRIS  
WEBB, an individual; BREARLY  
(INTERNATIONAL) LIMITED, a Gibraltar  
corporation; FRANK WARREN, an individual,

Defendants.

Chapter 11

Case No. 03-41900 (ALG)

(Jointly Administered)

Adv. No. 05-02210 (ALG)

**NOTICE OF HEARING**

**PLEASE TAKE NOTICE** that a hearing on the Motion for Default Judgment Against Brearly (International) Limited to (the “Motion”) filed by R. Todd Neilson, Plan Administrator of the MGT Chapter 11 Liquidating Trust (“Plaintiff”) on February 28, 2008, shall be held

before the Honorable Allan L. Gropper, United States Bankruptcy Judge, United States Bankruptcy Court (the "Bankruptcy Court"), One Bowling Green, Room 617, New York, New York 10004 on **March 20, 2008 (Eastern Time) at 10:00 a.m.**, or as soon thereafter as counsel may be heard.

**PLEASE TAKE FURTHER NOTICE** that any responses, if any, to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (General Order M-242 and the User's Manual for the Electronic Case Filing System can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), the official website for the Bankruptcy Court), by registered users of the Bankruptcy Court's case filing system and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), and shall be served in accordance with General Order M-242 upon the undersigned, with a copy delivered to Chambers, so as to be received no later than **March 17, 2008 at 5:00 P.M. (Eastern Time)**. Only those responses made in writing and timely filed and received will be considered at the Hearing. Any such response must state with specificity the reason or reasons why the relief requested in the Motion should not be granted.

Dated: February 28, 2008

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Beth E. Levine

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